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November 26, 2019

VIA ELECTRONIC FILING (ECF)

Hon. Pamela K. Chen, USDJ
225 Cadman Plaza East
Brooklyn, New York 11201

Re: He v. China New Star Restaurant, Inc., et al. (the “**Action**”)
Case No.: 1:19-cv-05907-PKC-CLP

Your Honor:

This law firm was just retained by defendants, China New Star Restaurant, Inc., Wai Shun Chan (a/k/a Vincent Chan), Wai Leung Chan, and Wai Wen Chan (a/k/a Daniel Chan) (collectively, “**Defendants**”), in connection with the above referenced Action. In accordance with Section 1(G) of Your Honor’s Individual Rules of Practice, I write to respectfully request that the time for Defendants to answer or otherwise respond to the complaint filed by plaintiff, Yong Xiong He (“**Plaintiff**”), be extended from November 29, 2019 through and including December 4, 2019. This request is being made as (1) this firm was only recently retained to represent Defendants and I require additional time to review and respond to Plaintiff’s claims, and (2) I have been out of state since November 20, 2019 and will be returning to the office Monday, December 2, 2019.

By letter dated November 22, 2019, directed to the Defendants, Plaintiff’s counsel advised if an attorney does not enter an appearance on Defendants’ behalf and/or file an answer by November 29, 2019, a default judgment would be sought against Defendants. In response to the foregoing, I contacted today Michael Winston, Plaintiff’s counsel, to request an extension of time to answer until December 4, 2019. Mr. Winston was kind enough to consent to my request.

This is the second request by Defendants for an extension of time. In connection with this request, I contacted Plaintiff’s counsel today and explained that I am out of state until Monday. Plaintiff’s counsel consented to the extension requested. The first request by Allen Wong, an attorney that contacted Plaintiff’s counsel on behalf of Defendants, for an extension of time was on November 15, 2019, which Plaintiff’s counsel to. It appears a request for an enlargement of time was never submitted to the Court for the November 15, 2019 extension request.

Respectfully submitted,

Bradley S. Silverbush

cc: All counsel (via ECF)